

Brian Quiros

From: Tisa, Kimberly
Sent: Wednesday, October 5, 2016 1:32 PM
To: Mike Zarba
Cc: Doubleday, Edward; Trombly, Gary; Tisa, Kimberly
Subject: RE: EPA Comments on submitted work plan documents for Century Enterprise Center PCB-related activities

Gentlemen:

Given that there has been no response to EPA's question on the most recent CWP submittal, we have reviewed the document submitted and provide the following comments:

1. As previously indicated, the submitted CWP dated October 4, 2016 Rev. 6 does not specifically address removal/disposal of the concrete associated with the T1-SB-7A area.
2. For the waste disposal, it is indicated that the PCB remediation waste from the slab milling operation will be disposed at Phase III Environmental.
 - a. While not specifically stated herein, the current data indicates PCB concentrations < 50 ppm in the top one-inch of concrete to be removed, but the CWP proposes additional samples on a 50x50-foot grid spacing to confirm that the PCB concentration is < 50 ppm. If PCB concentrations \geq 50 ppm are identified in the upper one-inch of concrete, this would represent a new site condition and notification to EPA would be required.
 - b. EPA cannot determine whether Phase III Environmental can accept the < 50 ppm PCB Remediation Waste based on its reading of the permit that was provided. The definition of regulated fill (page 2 of 7) is unclear. Further, it appears to be indicated that regulated fill could be moved off-site and use at another location. Thus, EPA requests clarification on how this disposal facility would meet the requirements for disposal of PCBs.
 - c. While there is discussion of dust monitoring during building demolition, at this point it is not clear in the CWP how the building columns, trusses, etc. would be managed in order to prevent spread of PCB contamination and how they are to be managed for disposal. EPA assumes that this information will be provided upon completion of the additional sampling and pilot test for decontamination.

Should you have any questions, please feel free to contact me.

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From: Tisa, Kimberly
Sent: Wednesday, October 05, 2016 9:11 AM

To: 'Mike Zarba'

Cc: Doubleday, Edward ; Trombly, Gary

Subject: RE: EPA Comments on submitted work plan documents for Century Enterprise Center PCB-related activities

I started review of the CWP. There is still no mention of the concrete at T1-SB-7A and disposal as a > 50 ppm PCB waste (scope of work, pages 3 and 4). The only mention is full depth removal of the concrete in former transformer locations T1 and T3 with disposal as < 50 ppm.

Is this the correct version that was provided as I know this is something that we discussed before? I want to confirm before I review this entire document.

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From: Mike Zarba [<mailto:mzarba@newmilford.org>]

Sent: Tuesday, October 04, 2016 4:12 PM

To: Tisa, Kimberly <Tisa.Kimberly@epa.gov>

Cc: Doubleday, Edward <EDoubleday@trcsolutions.com>; Trombly, Gary <Gary.Trombly@ct.gov>

Subject: Re: EPA Comments on submitted work plan documents for Century Enterprise Center PCB-related activities

Kim:

In response to these comments please find attached the updated PCB Contractor Work Plan (Rev 6), Phase III Environmental, LLC permit, sample location diagrams (w/ results shown per 100 sq. cm.) and sample results in spreadsheet format (2 files each), which address all of the items discussed yesterday with the New Milford project team. In total, I am transmitting 6 files.

Additionally, please note that we have included dust control methods to be employed during building demolition in Appendix E of this submittal. As specified, the steel will be maintained within the building footprint until either decontaminated or sampled for release. We understand that, per item 13.a.iii, sampling analytical results and proposed waste disposal details for the steel will be submitted to EPA for review prior to removal of these wastes from the Site.

The samples results are provided for your information, and as we discussed, we are currently evaluating decontamination methodology.